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GUSTAVE H. NEWMAN (1927-2017)

WILLIAM J. DOBIE

October 30, 2020

**BY ECF**

Hon. Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**MEMO ENDORSED**

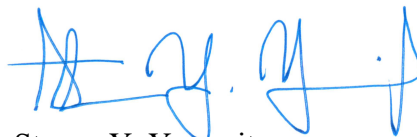
Re: *United States v. Leon Klein, et ano.*, 19-Cr-881 (KMK)  
**(Leon Klein's Unopposed Motion to Modify Bail Conditions)**

Dear Judge Karas:

This firm represents Leon Klein in the above-referenced matter. Mr. Klein needs to travel to Maryland on November 3, 2020 in connection with his ongoing medical treatment and anticipated surgery. He will likely need to be there for at least a week, and depending on the outcome of the surgery may also require follow-up visits. I am writing to request that Your Honor modify Mr. Klein's bail conditions to permit travel to the District of Maryland and through those districts that Mr. Klein may need to pass through on the way (i.e., Delaware and possibly Pennsylvania) in connection with this ongoing medical treatment. I have communicated with AUSA Shiva Logarajah and Pre-Trial Services Officer Vincent Adams and they have authorized me to represent that neither the government nor Pre-Trial Services oppose this application.

Accordingly, we respectfully request that Leon Klein's bail conditions be modified to permit travel to the districts of Maryland, Delaware and Pennsylvania commencing on November 3, 2020 in connection with his ongoing medical treatment, and for any required follow-up treatment.

Respectfully submitted,



Steven Y. Yurowitz

cc: AUSA Shiva Logarajah (by ECF)  
PTS Officer Vincent Adams (by email)

**GRANTED.**

SO ORDERED



KENNETH M. KARAS U.S.D.J.

**November 2, 2020**